

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Christopher Russell
Malik Cowper

Case: 2:20-mj-30509

Assigned To : Unassigned

Assign. Date : 12/8/2020

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 4, 2020 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 USC § 841, 844, 846

distribution, possession, and conspiracy to distribute controlled
substances

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: December 8, 2020City and state: Detroit, MI*Complainant's signature*

Special Agent Matthew Rummel

Printed name and title*Judge's signature*

David R Grand, United States Magistrate

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Rummel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the U.S. Department of Justice - Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so since September 2014. I am currently assigned to the Detroit Field Division. Prior to joining the ATF, I was employed, for approximately eight years, as a State Parole Agent with the Michigan Department of Corrections. During that time, for approximately four years, I was assigned to a multi-jurisdictional task force made up of federal, state, and local law enforcement agencies. I have participated in numerous investigations involving firearms, narcotics trafficking by armed individuals, fraud, robberies, assaults, homicides, and criminal street gangs. I have been the affiant on numerous federal search warrants and federal criminal complaints. I have a Bachelor's degree in criminal justice, and I am a graduate of the Federal Law Enforcement Training Center Criminal Investigator School and ATF's Special Agent Basic Training school.

2. I submit this affidavit in support of a criminal complaint charging that, on or about October 21, 2020, within the Eastern District of Michigan, Christopher

RUSSELL, DOB XX/XX/1994, intentionally distributed a mixture and substance containing a detectable amount of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. I also submit this affidavit in support of a criminal complaint charging that, on or about November 4, 2020, within the Eastern District of Michigan, Malik COWPER, DOB XX/XX/1999, intentionally distributed a mixture and substance containing a detectable amount of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. This affidavit is based upon information I have gained from my investigation, my training and experience, and from information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein. The information set forth in this affidavit is in support of a complaint and arrest warrant and is for the limited purpose of establishing probable cause; this affidavit, therefore, does not include all the information collected during this investigation and about which I am aware.

PROBABLE CAUSE

5. ATF, along with state and local law enforcement partners, is conducting a criminal investigation concerning Christopher RUSSELL (DOB: XX/XX/1994) and Malik COWPER, (DOB XX/XX/1999), for suspected violations of Title 21, United States Code, §§ 841, 844, 846 (distribution,

possession, and conspiracy to distribute controlled substances), and a variety of other federal and state criminal offenses.

6. On or about October 21, 2020, a Lenawee County Sheriff's Deputy/Detective, acting in an undercover capacity, along with local, state and federal law enforcement, conducted an undercover purchase of heroin/fentanyl from RUSSELL, in the city of Jackson, Michigan, located in the Eastern District of Michigan. Prior to the purchase, the undercover deputy (UC) was issued pre-recorded government funds and instructed to purchase heroin from RUSSELL.

7. The UC placed a phone call to a number utilized by RUSSELL to arrange for the purchase of narcotics (hereafter referred to as the NARCOTIC PHONE). RUSSELL answered the phone and instructed the UC to meet him at a BP gas station, located in Jackson, Michigan. The UC drove to the area and waited for RUSSELL. RUSSELL arrived in a white 2020 GMC Yukon, bearing Florida license plate JLAM29. The UC got into the back seat of the Yukon where he/she conducted the narcotics purchase with RUSSELL. The UC gave RUSSELL the pre-recorded government funds in exchange for heroin/fentanyl. Once RUSSELL departed the area, the UC was followed back to a pre-determined location and turned over the narcotics to law enforcement.

8. On November 4, 2020, the UC, along with local, state, and federal law enforcement, conducted an undercover purchase of heroin/ fentanyl from

Christopher RUSSELL and an individual identified as Malik COWPER in the city of Jackson, Michigan, located in the Eastern District of Michigan. Prior to the purchase, the UC was issued pre-recorded government funds, and instructed to purchase heroin from RUSSELL.

9. The UC placed a phone call to the NARCOTIC PHONE, to arrange the purchase. An individual, later identified as Malik COWPER, answered the phone. Prior to the UC being able to ask specifically where he/she was to go to purchase the heroin, RUSSELL got on the phone and explained to the UC that he was going out of town and that he would send his “little brother,” subsequently identified as Malik COWPER, to sell the heroin to the UC.

10. Following the conversation with RUSSELL, the UC spoke with COWPER again on the NARCOTIC PHONE, who instructed the UC to meet him at a BP gas station in Jackson, Michigan. The UC arrived and gave COWPER the pre-recorded government funds in exchange for a quantity of heroin/fentanyl. Once COWPER departed the area, the UC was followed back to a pre-determined location and turned over the narcotics to law enforcement.

11. ATF submitted the substances purchased during the undercover transactions, to the Oakland County Forensic Laboratory for testing. On December 2, 2020, Forensic Laboratory Chemist Rachel Scott, stated that all of the submitted

substances contained fentanyl and other traces of controlled substances, to include heroin.

12. Based on the above, I respectfully submit there is probable cause to find that, in or around October 21, 2020, within the Eastern District of Michigan, Christopher RUSSELL distributed a mixture and substance containing a detectable amount of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and on or about November 4, 2020, within the Eastern District of Michigan, Malik COWPER, DOB XX/XX/1999, intentionally distributed a mixture and substance containing a detectable amount of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Respectfully submitted,



Matthew Rummel, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and/or by reliable
electronic means on this 8th
day of December, 2020.



DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE
December 8, 2020